



Privacy Notice for EU Business Customers

This Notice applies to the European Union (EU)

Effective: 1 January 2021 as modified December 20, 2021

GENERAL TERMS OF USE

PLEASE READ THESE TERMS OF USE CAREFULLY. BY ACCESSING THIS WEBSITE OR USING THE PROCESSES OR SERVICES OF WEFI TECHNOLOGY GROUP LLC, YOU AGREE TO BE BOUND BY THESE TERMS OF USE. IF YOU DO NOT AGREE WITH THESE TERMS OF USE, PLEASE DO NOT ACCESS THIS SITE.

You are currently viewing a page of the wefitec.com website (“Site”) belonging to WeFi Technology Holdings LLC or one of its direct or indirect subsidiaries (“WeFi”). The general terms of use (“Terms of Use”) govern your access to and use of the Site, including any content, functionality, and services offered on or through the Site (“Services”). “You” and “your” refer to any person who accesses or uses the Site or Services. The Site is intended for individuals who are at least 18 years old. If you are under the age of 18 years old, please do not access this Site.

WeFi reserves the right to modify these Terms of Use at any time without notice. Any change to these Terms of use will be effective upon posting of such updated Terms of Use on the Site with an indication of the date modified after the title of the document. By continuing to access or use the Services after the date of any change to these Terms of Use, you agree to be bound by such terms contained in the most recent version of these Terms of Use. **WeFi reserves the right to modify or terminate the Services or to terminate your access to the Site, in whole or in part, at any time.**

Part 1. Introduction

What is this document and why should you read it?

WeFi Technology Group International LLC, a limited liability company organized pursuant to the laws of the State of Delaware, United States of America provides this privacy notice (“Notice”), as data controller, to describe our practices regarding the collection, storage, use, disclosure and other processing of Personal Data (defined below). WeFi may process your Personal Data in a variety of situations. These include when you or your organization have a relationship with a WeFi entity. As described below, other examples in which we may process your Personal Data are in the context of providing financial products and carrying out payment, and other financial services.

This policy relates to rights under the “GDPR” which means the *EU General Data Protection Regulation (GDPR)*: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ 2016 L 119/1 and all regulations, directives and opinions issued under its authority or relating thereto. If you or your organization has a relationship or shares Personal Data with a WeFi entity located in the U.S. or a country or jurisdiction outside the EU, a different privacy notice describes that entity’s practices and will guide its information collection and processing activities. The privacy notices for those WeFi entities are available at www.wefitec.com/privacy-security.



What types of Personal Data do we collect?

WeFi collects different types of Personal Data. Outside the United States, we primarily have customer relationships and accounts only with corporations and other legal entities. However, we may collect information about individual representatives of our customer organizations (“**Customers**”) or other individuals who have a connection to our Customers or the services we are performing (collectively, “**Individuals**”) such as the Individual’s:

- **Name.**
- **Work contact details:** work address, phone number, mobile phone number, email address, and online contact details.
- **Position description:** job title, employer and length of employment.
- **Authentication data:** passport or national identification card, driver’s license, other governmental identification information, home address and telephone number, documents that verify address, date of birth, country of domicile, and documents that verify employment, and signature authorisation.
- **Customer access or use data:** username and passwords to log into iZZi, our cloud-based portal, location data, other website or product access information.
- **Background or credit check data:** credit check information, background check information including credit and criminal checks and screening, but only to the extent required or permitted by local law.

Collectively, the above categories of data constitute “**Personal Data.**” We may collect, to the extent permitted by applicable law, Personal Data directly from Individuals, Customer, private lists and publicly available sources. Failure to provide this information may result in WeFi being unable to provide or continue to provide the requested services to the Customer.

Who are we?

WeFi is fintech company providing technology support, procuring funding and management of funding of technology vendors and distributors. We operate globally. As described in Part 2 below, in order to carry out our business operations we need to collect, process, and use Personal Data of Individuals and Customers every day.

Name of group parent: WeFi Technology Holdings International LLC
Headquarters location: 5299 DTC Blvd. Suite 720, Denver, CO 80111
USA

Part 2. Our handling of Personal Data

Why do we collect and use Personal Data?

WeFi Technology Group International LLC needs to collect, process and use Personal Data for a number of legitimate business reasons. A primary purpose is to ensure we can provide Customers with the products and services we offer and which they have requested. As described in greater detail below, we also need to use Personal Data for purposes of carrying out our business operations, including confirming a person’s authority as a representative or agent of a Customer, maintaining business continuity plans and processes, undertaking internal investigations and audits, handling legal claims, responding to



requests from funders and their supervisory agents, and complying with applicable laws and regulations such as “know your customer” and anti-money laundering activities on a global basis. We also obtain the consent of our data subjects.

We will only use Personal Data for the reasons listed below. We collect, process and use Personal Data:

- **To provide products and services requested by our Customers.** We collect and use work contact details, position description, authentication data, customer access or use data, financial data, and background or credit check data to perform obligations under our agreements, carry out related business functions, process data and transactions, conduct credit checks and due diligence, provide financial services, and manage Customer relationships and inquires, including when we need to contact Customers or Individuals with important information or for other administrative purposes.
- **To comply with legal obligations and regulations.** We collect and use work contact details, position description, authentication data, financial data, and background or credit check data to comply with applicable laws, regulations, and legal obligations applicable to WeFi Technology Holdings International LLC and its Affiliated Entities (defined below) in the United States and in other countries, including “know your customer” obligations based on applicable anti-money laundering and antiterrorism requirements, financial crime and fraud prevention, suspicious activity reporting, responding to requests from public authorities, complying with economic and trade sanction requirements, performing Customer and Individual due diligence, performing audit and risk assessments, conducting foreign exchange and international trade, preparing tax reports, complying with whistleblowing requirements, and handling legal claims.
- **To confirm a person’s authority as a representative or agent of a Customer.** We collect and use work contact details, position description, customer access or use data, and authentication data to confirm a person’s authority as a representative or agent of a Customer with which WeFi Technology Holdings International LLC or its Affiliated Entities have entered or intend to enter into various arrangements, including deposit contracts, loan contracts, contracts for foreign exchange transactions, contracts involving derivative transactions, letters of credit, loan services, account management, commercial banking, commercial real estate, structured lending, corporate and investment banking services, credit card issuance and processing, financial services, and investment management.
- **To conduct recordkeeping.** We collect and use work contact details, position description, authentication data, customer access or use data, financial data, and background or credit check data to facilitate managing our records in a systematic manner so they can be retrieved when required for legal, regulatory or operational reasons.

Jurisdiction and Cross-Border Transfer.

Personal data may be stored and processed in any country in which we have facilities, in which we provide services or in which we engage service providers, including the United States. In certain circumstances, courts, law enforcement agencies or regulatory agencies in those countries may be entitled to access Personal Data.

To whom do we disclose Personal Data?



We may disclose Personal Data, to the extent necessary and on a need-to-know basis, as follows.

- **Affiliated Entities.** WeFi Technology Holdings International LLC has affiliated entities and subsidiaries operating in the United States and around the world, including the group parent in the United States, WeFi Technology Group International LLC, WeFi Technology Group LLC, WeFi Technology Group Direct International, LLC, WeFi Technology Group Direct, LLC, and WeFi LATAM LLC (“**Affiliated Entities**”); (the “**WeFi Technology Group**” means WeFi Technology Holdings International LLC and our Affiliated Entities). WeFi Technology Group Holdings International LLC may disclose Personal Data to our Affiliated Entities on a worldwide basis and our affiliates may use the data for the purposes described above to the extent permitted by applicable law.
- **Beneficiaries, counterparties, and other parties related to a transaction; credit reference agencies.** The WeFi Technology Group International LLC Group may disclose Personal Data to beneficiaries, counterparties, credit insurers or other parties related to a transaction on a worldwide basis to provide the services requested by our Customers and to comply with legal obligations and regulations. We may provide Personal Data to credit reference agencies where allowed by law.
- **Service providers.** The WeFi Technology Group International LLC Group may disclose Personal Data to information technology providers or other service providers around the world that act on our behalf and under our instructions regarding the processing of such data (“**Data Processors**”). Data Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the Personal Data, and to process Personal Data only as instructed. The WeFi Technology Group International LLC Group may also disclose Personal Data to independent external auditors or other service providers around the world that may not be acting as a Data Processor. These service providers will be subject to any necessary contractual obligations to ensure the protection of such Personal Data.
- **Legal requirements.** The WeFi Technology Group International LLC Group may disclose Personal Data if required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from law enforcement or other public authorities wherever the WeFi Technology Group International LLC Group may do business; (b) protect and defend the rights or property of any WeFi Technology Group International LLC Group entity; (c) act in urgent circumstances to protect the personal safety of Individuals, Customers, and contractors/employees of any WeFi Technology Group International LLC Group entity or others; or (d) protect against any legal liability. In addition, the WeFi Technology Group International LLC Group may share Personal Data with U.S. regulators, and other self-regulatory bodies to which we are subject, wherever the WeFi Technology Group International LLC Group may do business.
- **Business transfers, combinations and related activities.** As we develop our business, the WeFi Technology Group International LLC Group might sell, buy, restructure or reorganize businesses or assets. In the event of any actual or proposed sale, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets, Personal Data may be shared with the relevant entity or may be part of the transferred assets and will be subject to any necessary contractual obligations to ensure the protection of such Personal Data.

The recipients of Personal Data identified above may be located in the United States or in other countries, including countries located outside the EU, which may not provide the same level of data protection as your home country. As needed, we will establish appropriate data transfer agreements with such



recipients, including agreements based on EU Model Contractual Clauses with respect to Personal Data transferred from the EU to a third country, or otherwise provide appropriate safeguards regarding transfers of Personal Data to other countries. When an Adequacy Decision is available, such as in the United Kingdom and Switzerland, We rely on such Adequacy Decisions, in addition to standard contract clauses and supplementary measures, such as data encryption. Please contact the privacy website using the contact information in Section 2 to obtain additional information about these safeguards. Note that for purposes of this Privacy Notice, an “**Adequacy Decision**” means a formal decision made by the EU recognizing that another country, territory, sector or international organisation provides an equivalent level of protection for Personal Data as does the EU.

How do we keep your Personal Data safe?

Personal Data will be safely stored in the databases of WeFi Technology Group International LLC and will be held and maintained by WeFi Technology Group International LLC or on behalf of WeFi Technology Group International LLC by WeFi Technology Group International LLC service providers. Appropriate measures are taken so that Personal Data can be kept accurate and up-to date, which will be in accordance with applicable security requirements. In an effort to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of Personal Data, we will take appropriate legal, organizational and technical measures to protect Personal Data and ensure it is accessed by our team members only on a need-to-know basis.

We will keep Personal Data no longer than necessary to fulfil the purposes described in this Notice. Under our record retention policy, we are required to destroy Personal Data after we no longer need it according to specific retention periods. However, we may need to hold Personal Data beyond these retention periods due to regulatory requirements of a particular country or in response to a regulatory audit, investigation or other legal matter. These requirements also apply to our third party service providers.

While registering with our website, mobile applications, or social media features (each, a “**Site**”), we may provide you with a unique identification and password for accessing our products and services. We encourage you to choose your password wisely such that no intruder or third party can obtain any unauthorized access to the Site. We also encourage you to keep your password confidential and not have any written or other record of the password that can be accessible by an intruder or third party.

Part 3. Your Rights in Relation to Personal Data

What are your rights?

Laws in the EU enable you to have appropriate control and oversight over what organisations do with your Personal Data. This Notice provides you with details about your Personal Data rights. If you have questions about your Personal Data rights, or whether different local laws apply, please contact the privacy website using the contact information below.

You have the following rights in relation to your Personal Data:

- **Access:** you can ask us for a description of the Personal Data we hold about you and our purposes for holding it; you can also ask for a paper or electronic copy of this information.
- **Rectification:** you can ask us to correct your Personal Data if you see that it is inaccurate or incomplete.



- **Objection:** you can object to our processing of your Personal Data where we base such processing on our legitimate interests or, if applicable, on public interests.
- **Erasure:** also known as “the right to be forgotten” appears in Recitals 65 and 66 and in Article 17 of the GDPR, providing, “(t)he data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.” Additional information regarding this right is provided below.
- **Restriction of processing:** you can ask us to stop using your Personal Data when you contest its accuracy, when you believe our use is unlawful, when you believe that the controller no longer needs the Personal Data, or when you wish us to keep but not use your Personal Data beyond our time limit for storage for the purpose of a legal claim you have made or plan to make. You can also ask us to stop using your Personal Data during the period we are processing your objection request.
- **Data portability:** you have the right to receive Personal Data you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to request that we transmit your Personal Data directly to another party if technically feasible. This right only relates to Personal Data which we process based on your consent, or on a contract you have with us, and where we carry out the processing by automated means.
- **Complaint with a supervisory authority:** you have the right to lodge a complaint with a data protection supervisory authority in the European Union.

In certain circumstances, we will need to use your Personal Data even though you may have asked us to restrict our use of it, or when you objected to our use. If this is necessary, we will do so in a lawful, fair, and transparent manner. Please contact the privacy website if you have any questions.

When does erasure or the right to be forgotten apply?

In Article 17, the GDPR outlines the specific circumstances under which the right to be forgotten applies. You have the right to have your Personal Data erased if:

- Your Personal Data is no longer necessary for the purpose an organization originally collected or processed it.
- We are relying solely on Your consent as the lawful basis for processing the data and You withdraw your consent.
- We are relying on legitimate interests as our justification for processing your Personal Data, you object to this processing, and there is no overriding legitimate interest for us to continue with the processing.
- We processed your Personal Data unlawfully.
- We must erase Personal Data in order to comply with a legal ruling or obligation.

When may we refuse to honor your request for erasure or the right to be forgotten.

Our right to process your Personal Data might override your right to request erasure or the right to be forgotten. Here are the reasons cited in the GDPR that trump the right to erasure:

- Your Personal Data is being used to exercise the right of freedom of expression and information.
- Your Personal Data is being used to comply with a legal ruling or obligation.
- Your Personal Data is being used to perform a task that is being carried out in the public interest.



- Your Personal Data represents important information that serves the public interest, scientific research, historical research, or statistical purposes and where erasure of the data would likely to impair or halt progress towards the achievement that was the goal of the processing.
- Your Personal Data is being used for the establishment of a legal defense or in the exercise of other legal claims.



How You Can Access, Change or Suppress your Personal Data

If you would like to request to review, correct, update, suppress or restrict personal data that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right of portability is provided to you by applicable law), you may contact us at your.privacy.matters@wefitec.com.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have the Personal Data suppressed from our database or otherwise let us know what limitations you would like to put on our use of the Personal Data. For your protection, we may only implement requests with respect to the Personal Data associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

Part 4. Other Information.

Other Information.

“Other Information” is any information that does not reveal a person’s specific identity or does not directly relate to an identifiable individual, such as:

- Browser and device information;
- App usage data;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you that does not reveal a person’s specific identity;
- Information that has been aggregated in a manner that it no longer reveals a person’s specific identity;
- Survey responses and similar information which reveals views and preferences, but which does not reveal a person’s specific identity.

If we required to treat Other Information as Personal Data under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Data as detailed in this Privacy Notice.

Collection of Other Information.

We and our service providers may collect Other Information in a variety of ways, including;

- Through a browser or device: certain information is collected by most browsers or automatically through devices, such as Media Access Control (MAC) address, computer type (Windows or MAC), screen resolution, operating system name and version, device manufacturer and model,



language, Internet browser type and version and the name and version of the Services (such as the App) being used. We use this information to ensure that the Services function properly.

- Using cookies: Cookies are pieces of information stored directly on the computer being used. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize the user's experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. We do not currently respond to browser do-no-track signals. Most browsers allow individuals to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. Please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for more information. Declining cookies may cause certain parts of the Services to cease working.
- Using pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), and compile statistics about usage of the Services and response rates.
- Analytics: We may use analytics which uses cookies and similar technologies to collect and analyze information about the use of Services and report on activities and trends. This service may also collect and analyze information about the use of the Services and report on trends and activities. This service may also collect information regarding the use of other websites, apps and online resources. We may use Flash LSOs and other technologies to among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings on your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also go to the Global Storage Settings Panel and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as "information"), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

Uses and Disclosures of Other Information. We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Data. If we do, we will treat the combined information as Personal Data as long as it is combined.

Contacting Us

If you have any questions about this Privacy Notice you may contact us at your.privacy.matters@wefitec.com.



Individuals may also file a complaint with a supervisory authority in the EEA competent for their relevant country or region. A list of data protection authorities is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Additional Information for France

Under French law, in addition to the above, individuals shall have the right to set guidelines regarding the retention, erasure and disclosure of their Personal Data after their death. Such right can be exercised by contacting us as set out in the “Contacting Us” section above.

Can we modify this Notice?

We will modify this Notice as a result of amendments to laws or regulations, or due to other reasons involving our operations. In such case, an amended Notice will be posted on our website at www.wefitec.com/privacy-security. The page providing the Notice will indicate the date when it was last updated.